

Commonwealth of Kentucky
Division for Air Quality

PERMIT APPLICATION SUMMARY FORM

Completed by:
Mark Labhart

GENERAL INFORMATION:

Name:	American Fuji Seal, Inc.
Address:	1051 Bloomfield Road, Bardstown, KY 40004
Date application received:	November 24, 1999
SIC/Source description:	3089
Source ID #:	21-179-00031
Source A.I. #:	3270
Activity #:	APE20040001
Permit number:	V-05-007

APPLICATION TYPE/PERMIT ACTIVITY:

<input checked="" type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input type="checkbox"/> Conditional major
__Administrative	<input checked="" type="checkbox"/> Title V
__Minor	<input checked="" type="checkbox"/> Synthetic minor
__Significant	<input type="checkbox"/> Operating
<input type="checkbox"/> Permit renewal	<input checked="" type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input checked="" type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
<input type="checkbox"/> PSD	<input checked="" type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
<input type="checkbox"/> Netted out of PSD/NSR	<input type="checkbox"/> Not major modification per 401 KAR 51:017, 1(23)(b) or 51:052,1(14)(b)	

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☒ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☒ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☒ Certified by responsible official
- ☒ Diagrams or drawings included
- ☐ Confidential business information (CBI) submitted in application
- ☒ Pollution Prevention Measures
- ☐ Area is non-attainment (list pollutants):

EMISSIONS SUMMARY:

Pollutant	Actual (tpy) ***	Potential (tpy)
PM/PM ₁₀	3.1	26.2
SO ₂	0.01	0.2
NO _x	2.1	26.3
CO	1.1	22.1
VOC	86.2	225 *
LEAD	0	0
Chromium	0.4	0.4
HAP **		
100-41-4 (Ethyl Benzene)	1.5	1.5
100-42-5 (Styrene)	0.6	2.3
108-88-3 (Toluene)	0.003	8.9
1330-20-7 (Xylene)	0.004	1.8
Varies (Glycol Ethers)	1.1	9.0 *

* Permit Limitation

** HAP not listed emitted at rates below 1 TPY.

*** 2004 emissions survey values except for Ethyl Benzene and Chromium, where the actual is assumed equal to the potential.

SOURCE PROCESS DESCRIPTION:

American Fuji Seal is a manufacturer of labels for the food, beverage and household products industry. Printing is one of the most prevalent activities at American Fuji and the primary source of emissions. The source has proposed constructing a ten-station, rotogravure printing press to print on plastic film. Solvent-based inks will be used. A recuperative catalytic oxidizer will control emissions from the press. This will be the second controlled press at the facility. The source has numerous other presses that use water-based, ultra violet cured, or electron beam cured inks. These types of ink have inherently low emissions and are therefore exempted from control. The plastic substrates are produced at the facility with a variety of plastic extrusion equipment. This equipment has a small amount of VOC and HAP emissions, along with particulate emissions (mainly from handling the raw material). American Fuji also plans to construct equipment for chrome plating of rotogravure printing cylinders. This equipment will be for used both for new cylinders and to recondition used cylinders.

This is the initial issuance of the source's plantwide Title V permit. The source has requested Synthetic Minor limitations on VOC emissions and additional limitations on HAP emissions. VOC emissions will be limited to 225 TPY to avoid PSD regulation. HAP emissions will be limited to 9 TPY single HAP and 22.5 TPY combined HAP. With the permit limitations on HAP emissions, American Fuji Seal will not be subject to the emission limitations of the Printing and Publishing MACT, (40 CFR 63, Subpart KK). Construction of the chrome plating facilities is subject to regulation under the MACT, 40 CFR 63, Subpart N.

EMISSION AND OPERATING CAPS DESCRIPTION:

American Fuji Seal voluntarily requested limits of less than 9.0 tpy for any individual HAP emission and less than 22.5 tpy for combined HAPs emission. American Fuji Seal also voluntarily requested Synthetic Minor permit limitations for VOC emissions. VOC emissions will be limited to less than 225 TPY.

OPERATIONAL FLEXIBILITY:

American Fuji Seal Inc. is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.